

# **EXHIBIT D**

**From:** Warren & Baram Management <jonathan@warrenandbaram.com>  
**Sent:** Tuesday, December 1, 2020 11:48 AM  
**To:** Greg Gutzler <ggutzler@dicelolevitt.com>  
**Cc:** david@warrenandbaram.com  
**Subject:** RE: CIVIL ACTION

Those prior emails that you claim you sent are irrelevant. You were just fishing then and also harassing models all over the Internet to fit your story of lies. The clock doesn't start until I'm served. I will let the honorable Judge Ramos know of your unreasonable response during a major pandemic. Don't forget to wear a mask !

Jonathan Baram

----- Original Message -----

Subject: RE: CIVIL ACTION

From: "Greg Gutzler" <[ggutzler@dicelolevitt.com](mailto:ggutzler@dicelolevitt.com)>

Date: 12/1/20 8:19 am

To: "Warren & Baram Management" <[jonathan@warrenandbaram.com](mailto:jonathan@warrenandbaram.com)>, "Frank Amanat" <[FAMANAT@dicelolevitt.com](mailto:FAMANAT@dicelolevitt.com)>, "Lisa Haba" <[lisahaba@habalaw.com](mailto:lisahaba@habalaw.com)>, "Justin Hawal" <[jhawal@dicelolevitt.com](mailto:jhawal@dicelolevitt.com)>

Cc: "david@warrenandbaram.com" <[david@warrenandbaram.com](mailto:david@warrenandbaram.com)>

Mr. Baram,

We assume from your email that you represent yourself and have not retained counsel. Please inform us immediately if that is incorrect. To be certain, please identify the “David” that you copied on your email to me.

We do not agree to any extension. You were given ample notice of this case on multiple occasions, yet you chose to ignore it. I sent you emails with the draft complaint on both July 15 and September 14. We gave you opportunities to discuss before we filed. You ignored the emails. You also ignored it after we sued your client and co-conspirator, Suelyn Medeiros.

As for your denial of the Jane Doe allegations, please let us know all investigation you performed and all facts demonstrating that our confirmed and corroborated facts are “ridiculous.”

1. Do you deny knowing Peter Nygard?
2. Do you deny flying multiple times on his jet with women?
3. Do you deny providing your passport number and contact information so that you could fly on Peter Nygard’s private jet?
4. Do you deny that you brought aspiring models to Peter Nygard?
5. Do you deny referring to yourself publicly as a “pimp?”
6. Do you deny having aspiring models stay in your residence?

The truth will continue to emerge and we anticipate more and more evidence about your actions emerging. We will take all appropriate action with the Court to ensure justice is served.



Greg G. Gutzler

**DICELLO LEVITT GUTZLER**

646.933.1000

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**From:** Warren & Baram Management <[jonathan@warrenandbaram.com](mailto:jonathan@warrenandbaram.com)>

**Sent:** Tuesday, December 1, 2020 3:24 AM

**To:** Greg Gutzler <[ggutzler@dicellosevitt.com](mailto:ggutzler@dicellosevitt.com)>

**Cc:** [david@warrenandbaram.com](mailto:david@warrenandbaram.com)

**Subject:** CIVIL ACTION

Due to Corona virus I need a 180 day extension. I am currently out of state. I deny all these unproven and ridiculous accusations.

Jonathan Baram